



Richman & Richman LLC

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April 29, 2024

Via CM/ECF

Honorable G. Michael Halfenger
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 140
Milwaukee, WI 53202

RE: In re: Wisconsin & Milwaukee Hotel LLC
Case No. 24-21743

Dear Judge Halfenger:

I am writing as proposed counsel to the referenced Debtor in relation to the Court's Docket Text Order of April 17, 2024 ("**Text Order**") [Doc 40] and the April 17, 2024 Interim Order Authorizing the Use of Cash Collateral, Granting Adequate Protection, and Scheduling Hearing on Final Authorization of Use of Cash Collateral (the "**Interim Cash Collateral Order**") [Doc 38] to request jointly with counsel to Computershare Trust Company, N.A. (the "**Lender**") that the hearing scheduled for this afternoon on the Debtor's pending Emergency Motion for Interim and Final Orders (1) Authorizing the Use of Cash Collateral, (2) Granting Adequate Protection, and (3) Scheduling a Final Hearing on Final Authorization of Use of Cash Collateral ("**Cash Collateral Motion**") [Doc 19] be continued (subject to the Court's schedule) to Friday, May 3, 2024.

Pursuant to the Text Order, objections to final relief with respect to all the motions for interim relief that were heard on April 17, 2024 were due to be filed by April 26, and a hearing was scheduled to be held at 3:30 p.m. today if necessary. No parties have filed objections. However, with respect to the Cash Collateral Motion, we and counsel to Lender have been engaged in negotiations of a final cash collateral agreement and proposed order, which we believe will result in an agreement shortly.

In the circumstances, and subject to the Court's approval, schedule and availability, we and Lender have agreed to extend the Interim Cash Collateral Order through and including May 3, 2024. We also request that any objections by the Lender to the relief sought in the Cash Collateral Motion be filed by noon on Thursday, May 2, 2024.



Honorable G. Michael Halfenger
April 29, 2024
Page 2

In the event we reach the expected agreement sooner, which is our expectation, we will file the new proposed final agreement and order and request that the adjourned hearing be cancelled.

Respectfully,

RICHMAN & RICHMAN LLC

Michael P. Richman
MPR/hms

Cc: Frank W. DiCatri (counsel to Lender)